

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re TIMOTHY M. COTTER : CHAPTER 13**  
**MELISSA S. COTTER :**  
**Debtor(s) : BANKRUPTCY NO. 17-13357**

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Timothy M. and Melissa S. Cotter, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by Freedom Mortgage Corporation on November 15, 2023. Debtors believe they can become current on all post-petition payments due under the June 29, 2020 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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